

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|---|---|-------------------------|
| DOROTHY HOULIHAN, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | C.A. No. 05-00194 JJF |
| v. |) | |
| |) | |
| SUSSEX TECHNICAL SCHOOL DISTRICT, |) | TRIAL BY JURY OF TWELVE |
| SUSSEX TECHNICAL SCHOOL DISTRICT |) | DEMANDED |
| BOARD OF EDUCATION, SANDRA WALLS- |) | |
| CULOTTA, individually, and in her official |) | |
| capacity, and STEVE HUBER, individually, and in |) | |
| his official capacity, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS' RENEWED MOTION TO DISMISS FOR FAILURE TO STATE
A CLAIM OR, IN THE ALTERNATIVE, MOTION FOR A MORE DEFINITE
STATEMENT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants hereby move the Court for dismissal of this action for the reasons stated in the Defendants Opening Brief in Support of Their Renewed Motion to Dismiss for Failure to State a Claim or, in the alternative, Motion for a More Definite State, which is incorporated herein as if set forth in full. In the alternate, pursuant to Federal Rule of Civil Procedure 12(e) and for

the reasons stated in Defendant's Opening Brief, the Court should order Plaintiff to provide a more definite statement.

RESPECTFULLY SUBMITTED,

WHITE AND WILLIAMS, LLP

/s/ William L. Doerler

JOHN D. BALAGUER

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Attorneys for Defendants Sussex Technical
School District, Sussex Technical School
District Board of Education, Sandra Walls-
Culotta, and Steve Huber

Date: August 17, 2006

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| his official capacity, |) | |
| |) | |
| Defendants. |) | |

CERTIFICATE OF SERVICE

I, William L. Doerler, do hereby certify that on this 17th day of August, 2005,
Defendants' Renewed Motion to Dismiss for Failure to State a Claim or, in the Alternative,
Motion for a More Definite Statement was served upon the following via electronic filing
and/or regular mail:

Brian F. Dolan, Esquire
Stumpf, Vickers & Sandy, P.A.
8 West Market Street
Georgetown, DE 19947
Attorney for Plaintiff

WHITE AND WILLIAMS, LLP

/s/William L. Doerler

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Education, Sandra Walls-Culotta, and Steve Huber